

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SUZANNE GENEREUX and BARRY
GENEREUX, Individually and as Parents and
Natural Guardians of their minor children,
ANGELA GENEREUX and KRISTA
GENEREUX

Plaintiffs,

v.

AMERICAN BERYLLIA CORP., BRUSH
WELLMAN, INC., BRUSH WELLMAN
CERAMICS INC., BRUSH WELLMAN
CERAMIC PRODUCTS INC., HARDRIC
LABORATORIES, INC., KYOCERA
AMERICA, INC., KYOCERA INDUSTRIAL
CERAMICS CORP., and RAYTHEON
COMPANY

Defendants.

No. 04-CIV-12137 JLT

**DECLARATION OF FRANK BALINT IN SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANT KYOCERA INDUSTRIAL CERAMICS CORP.'S
MOTION TO DISMISS OR FOR SUMMARY JUDGMENT**

1. My name is Frank Balint. I am an adult resident of the state of New Hampshire. My address is 14 Eastview Drive, Unit #36, Wilton, NH 03086.
2. I am a former employee of the Raytheon plant located at Waltham, Massachusetts, where I worked as a senior manufacturing engineer from 1981 until 1989. I have personal knowledge of the facts set forth in this declaration.
3. During my time at the Waltham plant, I worked as a senior manufacturing engineer in the vacuum tube operations of four different programs. As a senior manufacturing

engineer, I was responsible for overseeing the assembly of each device, ensuring compliance with all specifications, and the testing of completed devices.

4. My first job was as senior manufacturing engineer for Sea Sparrow Missiles, where I oversaw the production of Klystron Amplifier Tubes for use in guidance and communication systems within the missiles. Next, I oversaw the production of Klystron Amplifier Tubes for Hawk Missiles. My next position involved oversight and supervision of production of Traveling Wave Tubes for Patriot Missiles. Lastly, I oversaw production of Backward Wave Oscillator ("BWO") jamming devices used on B-52 bombers.

5. Ceramics, including beryllium ceramics, were used as insulators between high-voltage components in at least two of the four projects for which I was senior manufacturing engineer. These ceramics would undergo sand blasting, which produced dust.

6. I never worked on any projects and/or components related to the Trident I and II missile programs, nor did I do any work relating to semiconductor chip packages for missile guidance systems.

7. For each of the four projects for which I was senior manufacturing engineer, rejected or questionable materials were reviewed and evaluated by a panel of Quality Control engineers. From time to time I was called in to the quality control panel as a participant when reviewing specification and materials from projects that I was overseeing. In addition, as a daily part of my job as a senior manufacturing engineer, I was required to review the materials being used, and thus became acquainted with the identity of the suppliers of these materials.

8. Kyocera supplied beryllium and/or beryllium ceramics used as insulating material for one or more of the four product lines on which I worked. I recall seeing Kyocera packaging

and materials on several occasions in conjunction with my work on Sea Sparrow, Hawk, and Patriot Missiles, and BWO jamming devices. Kyocera beryllium ceramics were used as insulators in one or more of the projects for which I was senior manufacturing engineer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of ^{March} ~~November~~, 2004th

Frank Balint
Frank Balint